

**REMARKS**

Entry of this Amendment, reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims are respectfully requested in light of the above amendments and the following remarks. Claims 1-27, as shown above, remain pending herein. Claims 1, 6, 11, 16, 20, 23, 25 and 27 have been amended to recite that the structure node, while associated with certain content nodes, is an independent node. Claim 28 has been added, support for which is found in the specification at least at page 11, lines 11-22.

Applicants acknowledge that the rejection of claims 1, 3 and 23 under 35 U.S.C. §102 has been withdrawn.

Claims 1-4, 6-9, 11-14 and 16-27 stand rejected under 35 U.S.C. §103(a) by “XML Fragment Interchange, W3C Working Draft, June 30 1999 (herein after “W3C”). Applicants respectfully traverse this ground of rejection.

In the W3C draft, it is proposed that the fragment includes a fragbody tag place with the content information to indicate the placement of content information within a particular tree.

In contrast, in the presently claimed invention, the structure node is independent of the content nodes, is generated independently and can be transmitted independent of the content nodes. This process is advantageous over W3C because content information can be quickly stored or read once identified as a content node, whereas structure information requires a different means of processing. In other words, by tagging every unit in W3C with structure information, a processor must determine what structure is being disclosed and its spatial relationship in addition to the content information that may be present.

Thus, the presently claimed invention provides a more efficient way of processing information as a processor reading storage does not have to get bogged down with its spatial relationship for each body of data. It is also respectfully submitted that a person of ordinary skill in the art would not have found any disclosure, suggestion, or motivation from W3C that would have made any of the instant claims obvious in view thereof, Reconsideration and withdrawal of this ground of rejection are respectfully requested.

Claims 5, 10, and 15 stand rejected under 35 U.S.C. §103(a) over W3C as applied to claims 1, 6 and 11 above, and further in view of Dietz (U.S. 6,175,820). Applicants respectfully traverse this ground of rejection.

Applicants respectfully submit that claims 5, 10 and 15 are allowable at least for their dependence on one of claims 1, 6 and 11, respectively, which are believed to be allowable for the reasons indicated above. The addition of Dietz to W3C still fails as a combination to disclose, suggest, or motivate the artisan such that any of the present claims would have been obvious. These claims are also believed to be allowable because of an independent basis for patentability as well.

For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Respectfully submitted,

Dan Piotrowski  
Registration No. 42,079



Date: March 18, 2004

By: Steve Cha  
Attorney for Applicant  
Registration No. 44,069


**Mail all correspondence to:**

Dan Piotrowski, Registration No. 42,079  
US PHILIPS CORPORATION  
P.O. Box 3001  
Briarcliff Manor, NY 10510-8001  
Phone: (914) 333-9624  
Fax: (914) 332-0615

**Certificate of Mailing Under 37 CFR 1.8**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to MAIL STOP AF, COMMISSIONER FOR PATENTS, P.O. BOX 1450, ALEXANDRIA, VA. 22313 on March 18, 2004.

Steve Cha, Reg. No. 44,069  
(Name of Registered Rep.)

  
(Signature and Date)